



February 1, 2006

VIA ELECTRONIC DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: T-Mobile USA, Inc. E-911 Quarterly Report

Dear Ms. Dortch:

In accordance with the terms of the consent decree between T-Mobile USA, Inc. (“T-Mobile”) and the Federal Communications Commission (“FCC” or “Commission”) related to T-Mobile’s deployment of E-911 Phase II services, T-Mobile hereby submits its February 2006 E-911 Quarterly Report (“Report”).¹

Since our last Quarterly Report in November 2005, our progress on E-911 deployment remains steadfast. To date, T-Mobile has deployed 1199 requests it has received as of January 31, 2006 for Phase I service where it has coverage. The total number of PSAPs receiving Phase I information from T-Mobile as a result of these deployments is 2603.

With respect to Phase II, T-Mobile has made and continues to make significant deployments of its network-based Uplink-Time Difference of Arrival (“TDOA”) solution for delivering Phase II location information to PSAPs.² T-Mobile anticipates that it will continue to fulfill the requirements contained in its consent decree to deploy Phase II

¹ *In the Matter of T-Mobile, USA, Inc.*, Order, File No. EB-02-TS-012, FCC 03-172 (rel. July 17, 2003) (“T-Mobile Consent Decree”).

² TDOA calculates a mobile phone’s location by comparing the difference in the times at which a signal transmitted from the phone reaches three or more Location Measurement Units (“LMUs”) installed in a wireless carrier’s base stations.

services across its markets in a timely fashion.³ In fact, to date T-Mobile has deployed 779 of the Phase II requests it has received as of January 31, 2006 where it has coverage, and a total of 1919 PSAP entities are currently receiving Phase II information under these deployments.

I. Phase I and Phase II Requests

Paragraph 10(a) of T-Mobile's consent decree requires that T-Mobile provide certain information on all pending Phase I and Phase II requests it has received. **Attachment A** to this Report provides the required information. This attachment follows the standardized reporting spreadsheet the Commission requires Tier I carriers to include with their Quarterly Reports.⁴

Attachment A lists all PSAPs covered by requests for Phase I and/or Phase II service received by T-Mobile as of January 31, 2006.⁵ T-Mobile has indicated which requests have been deployed and the dates of deployments (note that in a number of cases T-Mobile has deployed Phase I E911 service to a PSAP without receiving a request from the PSAP but, in anticipation of receiving such a request, worked with the PSAP and its service provider to complete the deployment). Where a PSAP's request has not been fulfilled, T-Mobile has supplied the projected deployment date, and the reason(s) for delay if a PSAP's Phase I request has not been satisfied within 6 months from the date of receipt of the request. T-Mobile's projected deployment dates reflect its current estimate of when it should satisfy a PSAP's request for Phase I or Phase II services; these dates, however, depend on external factors such as vendor performance, and PSAP and LEC readiness, and could potentially change.

Regarding the field labeled "Invalid Request" on the spreadsheet, T-Mobile has placed a "Yes" in the field to designate a PSAP's request as invalid in cases where T-Mobile: (a) currently does not have coverage in the area for which the PSAP is

³ T-Mobile's plan is designed to achieve the swiftest possible deployment of Phase II equipment and services across all of T-Mobile's markets nationally. However, as the consent decree recognizes, T-Mobile is relying on the representations of its vendors in its plans to meet the deployment schedule contained therein. See T-Mobile Consent Decree at ¶ 8(c). Further, other issues such as PSAP readiness or LEC issues may impact a carrier's ability to deliver Phase II information to PSAPs under the consent decree.

⁴ Public Notice, *Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, CC Docket No. 94-102 (rel. June 6, 2003). T-Mobile has only included the fields for PSAPs in its licensed footprint from which it has received Phase I and Phase II requests. (T-Mobile automatically considers a request for Phase II information as incorporating a request for Phase I information.)

⁵ Note that in accordance with Paragraph 10(a) of the T-Mobile Consent Decree, for all pending Phase I and Phase II requests, T-Mobile has reported in **Attachment A** the date on which it received the particular request from the PSAP.

responsible and therefore the request is invalid under the Commission's Rules;⁶ or (b) has filed a certification with the FCC pursuant to the Richardson Recon Order.⁷ In some cases T-Mobile has not received all the documentation required under the Richardson Order⁸ to determine PSAP readiness, therefore these requests are marked as tolled per the Order. (T-Mobile has also noted where the requests are classifiable as "tolled" if received after the effective date of the Richardson Recon Order.) **With the exception of instances in which it does not have coverage, however, T-Mobile's operating policy is not to delay implementation based on questions about the validity of a particular request, but to proceed to deploy the request as much as possible.** T-Mobile does reserve the right in the future to assert the invalidity of a request, or to file a certification with the FCC regarding a particular request, should circumstances arise that warrant such action, notwithstanding the fact that it does not categorize a particular request as invalid in this Report.

II. T-Mobile Location Technology Compliance

Paragraph 10(b)(1) of T-Mobile's consent decree requires that each Quarterly Report contain a statement of whether T-Mobile's network based technology for delivering Phase II information meets the Commission's network based accuracy requirements. T-Mobile hereby reports that to date, the network-based location technology deployed for delivering E911 Phase II location information does meet the Commission's network-based accuracy requirements of 100 meters for 67 percent of calls and 300 meters for 95 percent of calls.

III. Compliance with Consent Decree Benchmarks

Paragraph 10(b)(2) of T-Mobile's consent decree also requires that T-Mobile's Quarterly Reports contain statements regarding whether T-Mobile has met each deployment benchmark falling due in the period immediately preceding the Quarterly Report. In accordance with Paragraph 8(a)(8) of the consent decree, T-Mobile is providing Phase II service to at least 50% of PSAPs' coverage areas or population within six months of receipt of request for all PSAPs that requested service after February 28, 2004, with the exception of areas in which T-Mobile does not provide service, only recently began providing service, or for which the PSAP has agreed to a different deployment date. For a

⁶ See 47 C.F.R. § 20.18(a).

⁷ *Petition of City of Richardson*, Order on Reconsideration, CC Docket No. 94-102, 17 FCC Rcd 24282 (2002) ("Richardson Recon Order").

⁸ *Petition of City of Richardson*, Order, CC Docket No. 94-102, 16 FCC Rcd 18982 (2001) ("Richardson Order").

majority of these requests, in fact, T-Mobile provided Phase II service to 100% of those PSAPs' coverage areas or population, well ahead of the deadline of 15 months from the date of the request, as provided under paragraph 8(a)(8) of the consent decree.

IV. NSS/E-OTD

Pursuant to paragraph 10(b)(10) of T-Mobile's consent decree, T-Mobile confirms that it continued to provide NSS location information to PSAPs for all deployments that were receiving and utilizing such location information as of the Effective Date of the decree (the sole exception being those instances in which PSAPs agreed to migrate from NSS as they transitioned to TDOA service). Further, T-Mobile has completely de-commissioned E-OTD and is providing TDOA location information to those PSAPs previously receiving E-OTD information.

Finally, included with this letter is a declaration from an officer of T-Mobile attesting to the truth and accuracy of this Report, pursuant to Paragraph 10 (c) of T-Mobile's consent decree. T-Mobile is serving this Report on the Executive Directors and counsel for the Association of Public-Safety Communications Officials-International, Inc., the National Emergency Number Association, and the National Association of State Nine One One Administrators, as provided for in the decree. Please contact the undersigned should there be further questions.

Respectfully submitted,

By: /s/ Robert A. Calaff
Robert A. Calaff
Director, Technology Policy

Attachment

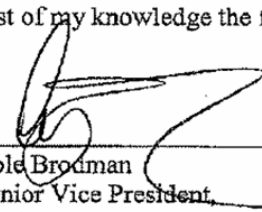
cc: Kris Monteith, Chief, Enforcement Bureau
Catherine Seidel, Acting Chief, Wireless Telecommunications Bureau
Tim Ryan, Acting Executive Director, APCO
Bill Cade, 9-1-1 Director, APCO
Rob Martin, Executive Director, NENA
James R. Hobson, Counsel, NENA
Steve Marzolf, President, NASNA

Fred Campbell, Office of Chairman Martin
John Giusti, Office of Commissioner Copps
Barry Ohlson, Office of Commissioner Adelstein
Aaron Goldberger, Office of Commissioner Tate
Nicole McGinnis, Wireless Telecommunications Bureau
Michael Wilhelm, Wireless Telecommunications Bureau
David Siehl, Wireless Telecommunications Bureau
Lisa Fowlkes, Enforcement Bureau
Katherine Berthot, Enforcement Bureau

DECLARATION OF COLE BRODMAN

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct.

Executed on February 1, 2006



Cole Brodman
Senior Vice President,
Product & Systems Development,
Chief Development Officer
T-Mobile USA, Inc.
12920 S.E. 38th Street
Bellevue, WA 98006